<center>**REMARKS**</center>

At the time the current Official Action was mailed, the Examiner rejected claims 1-33.

Claims 1-9 and 12-33 remain pending in their original form, claim 10 has been amended, claim

11 has been cancelled, and new claim 34 has been added. Reconsideration of the application in

view of these amendments and in view of the remarks set forth below is respectfully requested.

Rejections under 35. U.S.C. § 102

The Examiner rejected claims 1-33 under 35 U.S.C. § 102 as being anticipated by

Geelen. (U.S. Publication no. 20040243307). Specifically, the Examiner stated:

> As to claims 1, 27, 32-33,Geelen discloses a telematics assembly
> comprising an input device configured to receive an arbitrary code pre-
> assigned to correspond to a point-of-interest (POI); a communication device
> configured to initiate communication with a database having data related to
> the POI in response to the code; and a receiving device configured to ⋅
> receive the data related to the POI from the database (See paragraphs
> 0054,0057)

> As to claim 2, Geelen discloses the receiving device comprises a
> display configured to present the data related to the POI visually (See
> paragraph 0057).

> As to claim 3, Geelen discloses a positioning device configured to
> provide the location of the telematics assembly (See paragraph 0054).

> As to claims 4-5, 16-1 7, 22-23 Geelen discloses the communication
> device is configured to communicate device is configured to communicate
> with a wireless network wherein the database is accessible via the wireless
> network (See paragraph 0046-0047)

> As to claim 6, Geelen discloses a data storage device wherein the
> database is maintained on the data storage device (See paragraphs 0049,
> 0054).

> As to claims 7, 12, Geelen discloses the data storage device is
> configured to communicate wirelessly with at least one of the input device
> and the receiving device (See paragraph 0046).

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As to claim 8, Geelen discloses a a telematics system comprising an input device configured to receive an arbitrary code pre-assigned to correspond to a point-of-interest (POI); for facilitating transmittal of a request to a database having information about a location of the POI, the database being configured to provide the information about the location of the POI in response to the request; a receiving device configured to receive the information about the location of the POI from the database; a navigation device configured to determine a location of the individual to provide output data comparative of the location of the individual and the location of the POI; and an output device (display) configured to present the output data to the individual (See paragraphs 0047, 0054, 0057, 0060)

As to claims 9, 19, Geelen discloses the navigation device is configured to determine at least one route for travel between the location of the individual and the location of the POI (See paragraph 0057).

As to claims 10, 15, Geelen discloses the output device comprises a display for displaying the output data to the individual visually (See paragraph 0047).

As to claim 11, Geelen discloses the input device comprises a keypad (in the PDA) See paragraph 0028).

As to claim 13, Geelen discloses the network provides a link to a remote processor configured to develop the output data (See remote database over WAN paragraph 0047).

As to claim 14, Geelen discloses a vehicle; and a navigation system located in the vehicle (See paragraph 0030) comprising an input device configured to receive an arbitrary code pre-assigned to correspond to a point-of-interest (POI); for facilitating transmittal of a request to a database having information about a location of the POI, the database being configured to provide the information about the location of the POI in response to the request; (See paragraph 0046, 0047); a positioning device (GPS; see paragraph 0073); and a receiving device configured to receive the data related to the POI from the database (See paragraph 0047,0054,0057,0060).

As to claims 18, 20, Geelen discloses the data related to the POI includes a location of the POI, and wherein a server is configured to provide to the receiving device output data comparative of the location of the vehicle and the location of the POI (See paragraph 0057).

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As to claim 21, Geelen discloses a method of providing data relating to a point-of- interest (POI), comprising the acts of receiving a communication initiation request from a telematics device developed the communication initiation request in response to entry of an arbitrary code pre-assigned to represent the POI into the telematics device; receiving a request from the telematics device, wherein the telematics device developed the request in response to entry of the arbitrary code into the telematics device; obtaining information regarding the POI from a database in response to the request; and providing the information regarding the POI to the telematics device (See paragraph 0057).

As to claim 24, Geelen discloses a geocoding feature on page 7 wherein one would inherently use for assigning a code to a discrete POI to index information about the POI in the database.

As to claim 25, Geelen discloses providing information regarding a location of the POI to the telematics device (See paragraph 0057).

As to claims 26, 30, Geelen discloses obtaining a location of the telematics device and the location of the POI; and developing at least one route for travel between the location of the telematics device and the location of the POI (See paragraph 0057).

As to claims 28-29, 31, Geelen discloses entering a data-type code (via the user select entry) into the telematics device for requesting a particular type of information regarding the POI (See paragraph 0057). Also discloses on page 7 data type code facilitates activation of a feature of the telematics device.

Office Action, pages 3-5.

Applicant respectfully traverses these rejections. Anticipation under Section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under Section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). To maintain a proper rejection under Section 102, a single reference must teach each and every element or step of the

rejected claim. *Atlas Powder v. E.I. du Pont*, 750 F.2d 1569 (Fed. Cir. 1984). Thus, if the claims recite even one element not found in the cited reference, the reference does not anticipate the claimed invention.

Like the system described in the Geelen reference, the present application is also directed to providing information related to a point-of-interest (POI). However, the Geelen reference and the present application solve problems relating to providing information regarding a POI in markedly different ways.

In the present application, Applicant notes that one way of obtaining information regarding a particular POI is for the user to at least partially enter the name of the POI. Application, page 2. Unfortunately, on a traditional numeric keypad, it may be difficult to enter an alphabetic name of the POI. *Id.* Furthermore, the name of the POI may be long or difficult to spell, thus making use of an alphabetic entry even more burdensome. *Id.* To address this problem, Applicant has proposed assigning an "arbitrary code" to each POI or category of POIs. *Id.* at page 4. That is, each POI or category of POIs is assigned a code that does not necessarily alphabetically or alphanumerically substantially correspond to the name of the POI. *Id.* For example, each code may be numeric or predominantly numeric because such codes are easy to remember and easy to enter using a traditional numeric keypad, as opposed to entering the name or address of the POI. *Id.* An example described in the present application assigns the code 456789 to ACME Pizza restaurant. Upon entry of the code, the system retrieves data related to the POI. *Id.* at pages 18-19. Accordingly, each of the independent claims of the present application recites the use of such an "arbitrary code."

In sharp contrast to Applicant's claimed invention, the Geelen reference does not disclose the use of any type of code, arbitrary or otherwise, to obtain information relating to a POI. Instead, the Geelen reference utilizes icons and/or user lists that allow a user to obtain more information regarding a particular POI. *See, e.g.,* Geelan, Figs. 4A, 4B, 5A-E, 7C, and 7E. Indeed, in sections 3-6 of the Geelan reference, it is clearly described that a user selects one of the displayed icons or one of the displayed items on a list to obtain more information regarding the particular POI. The Geelen reference never once mentions entering a code of any kind, much less an "arbitrary code" as set forth in the present claims.

Because the Geelen reference does not disclose the subject matter set forth in the present claims, the Geelen reference does not support a *prima facie* case of anticipation as alleged by the Examiner. Therefore, Applicant respectfully requests withdrawal of the Examiner's rejection and allowance of original claims 1-33. Furthermore, the Examiner should note that new claims 34-47 have been added to further define the "arbitrary code" recited in each independent claim to include a "numeric code" and a "predominantly numeric code." Again, the subject matter of dependent claims 34-47 distinguishes over the prior of record for the reasons set forth above. Therefore, Applicant respectfully requests allowance of new claims 34-47 as well.

Conclusion

In view of the remarks set forth above, Applicant respectfully requests reconsideration of the Examiner's rejections and allowance of all pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: <u>March 7, 2006</u>

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